

AUG 22 1997

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C.

FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

In the Matter of

Advanced Television Systems
 And Their Impact Upon The
 Existing Television Broadcast
 Service

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MM Docket No. 87-268

To: The Commission

SUPPLEMENT TO PETITION FOR RECONSIDERATION

Educational Television Association of Metropolitan Cleveland ("ETAMC"), through its attorneys, hereby files this Supplement to its Petition for Reconsideration filed on June 13, 1997 with respect to the Sixth Report and Order, released April 21, 1997 in the above-captioned proceeding, which adopted the Digital Table of Allotments and related technical rules regarding the digital television broadcast service. In support thereof, the following is shown:

1. ETAMC is the licensee of public television Station WVIZ(TV), which operates on Channel *25 at 2140 kW and which has been allotted DTV facilities on Channel 26 at 64 kW. On January 11, 1996 ETAMC filed a minor application to increase the power of Station WVIZ to 5 megawatts (FCC File No. BPET-960111KF). That application remains pending at the Commission. The parameters proposed in this pending modification application were not considered by the Commission when pairing DTV Channel 26 with NTSC Channel 25.

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2. ETAMC's Petition for Reconsideration was based on preliminary interference and coverage analyses without the benefit of FCC Bulletin OET-69 ("OET-69"). The attached engineering statement supplements that earlier filing with additional information based on OET-69.

3. That engineering study concludes that increasing the power of the proposed DTV allotment for WVIZ "would create new interference to no less than four other facilities virtually precluding any meaningful increase in power on Channel 26." Therefore, ETAMC would not be able to achieve the 5 megawatt power increase proposed in its pending application for WVIZ on existing Channel *25, filed in full technical compliance with the Commission's rules and at a time far in advance of April 3, 1997, the date the Commission utilized for its engineering database for the DTV Table. A study was also conducted regarding a possible alternative channel, but this study could not be completed because of the uncertainties with respect to protection requirements for Canadian facilities.

4. It is essential that negotiations should be concluded with Canada on DTV matters in advance of resolving the Commission's DTV proceeding, so that licensees such as ETAMC may properly assess their allotments and alternatives. At the present time WVIZ can neither maximize its DTV facility on Channel 26 nor propose a replacement channel. Accordingly, ETAMC urges the Commission to hold in abeyance its finalization of its DTV Table relative to border stations until the agreement with Canada has been completed. Otherwise, ETAMC is concerned that Canadian authorities may

lock its own border plan at power levels which preclude effective coverage by United States border stations.

Respectfully submitted,

EDUCATIONAL TELEVISION ASSOCIATION
OF METROPOLITAN CLEVELAND

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ENGINEERING STATEMENT

in support of

Educational Television Association of Metropolitan Cleveland

**WWIZ-TV
Cleveland, OH**

Educational Television Association of Metropolitan Cleveland (ETAMC) is the licensee of WWIZ-TV, Cleveland, OH. ETAMC filed a petition for reconsideration regarding its DTV allotment on June 13, 1997. This engineering statement supplements that earlier filing with additional engineering information based on the recent availability of Bulletin OET-69.

DTV Allotment

WWIZ-DT has been allotted Channel 26 at a power level of 64 kW. WWIZ currently operates with an ERP of 2140 kW on Channel 25 and has a pending application for a power increase to 5000 kW.

Because of the Commission's replication methodology, WWIZ would be required to reduce its omnidirectional power to approximately 20 kW ERP in order to comply with the DTV power table for this facility. It is not likely that a directional antenna matching the values generated by the Commission can be constructed; even if a practical directional antenna is employed, the maximum ERP would have to be reduced to approximately 40 kW.



WWIZ must compete in a marketplace where all but one of the other stations have been allotted greater DTV power levels including two stations with ERP's of 897 kW and 1000 kW, respectively.

A study has been made using guidance provided by OET-69 and the NTIA-ITS-TAS computer model to determine whether the WWIZ allotment can be maximized. That study reveals that increasing power would create new interference to no less than four other facilities virtually precluding any meaningful increase in power on Channel 26.

Alternative Channel

A study was conducted to determine whether a different channel could be substituted for Channel 26. While the study revealed some possibilities for a revised channel allotment relative to existing domestic facilities (and proposed DTV facilities), the studies could not be completed because of the uncertainties of dealing with the protection requirements for Canadian facilities. Even though the location of WWIZ-DT on the south shore of Lake Erie will provide some opportunities to provide significant protection towards Canada without seriously impacting service to its U.S. audience, it is impossible to fully evaluate any proposal to change channels without having the protection requirements of Canada.

Conclusion

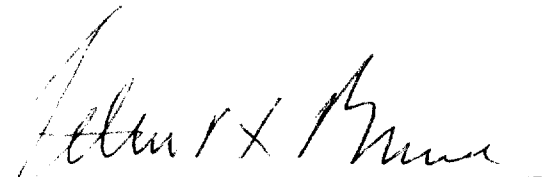
ETAMC is concerned that it will not be able to increase its power or maximize its DTV facility on Channel 26 and cannot propose a replacement channel without having the Canadian requirements. Therefore, it is suggested that the Commission hold in abeyance the finalization of the allotment table relative to border TV stations until the agreement with Canada has been negotiated and finalized.

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Certification

This statement was prepared by me or under my direction. All assertions contained in the statement are true of my own personal knowledge except where otherwise indicated and these latter assertions are believed to be true.

A handwritten signature in cursive script, appearing to read "John F.X. Browne", written over a horizontal line.

John F.X. Browne, P.E.
August 21, 1997